U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION REPORT

I. Heading

Date: December 20, 1994

From: Joe Rotola, OSC, US EPA Removal Action Branch

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TAT

Pyridium Mercury Disposal Site No. 1 Subject:

Village of Harriman, Orange County, NY

POLREP: One

II. Background

SITE NO.: EV Delivery Order: N/A Response Authority: CERCLA CERCLIS NO.: N/A

NPL Status: Not on NPL

State Notification: NYSDOH Notified

Action Memorandum Status: Under Preparation

Start Date: N/A special to sets shi while Demobilization Date: N/A Completion Date: N/A

III. Site Information

Incident Category

CERCLA incident category: Other - Industrial Landfill

Site Description Staving AND TO BE STAVING THE STATE OF T

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The Pyridium Mercury Disposal Site No. 1 is a trailer park located at the intersection of State Route 17M and Harriman Heights Road in the Village of Harriman, Orange County, New York (Latitude: 41° 18' 23.6" N, / Longitude: 74° 9' 13.3" W). Five mobile home trailers are located on site. All trailers are occupied as residential dwellings.

A white clay-like material was discovered at the site during an unrelated investigation at the adjacent transmission shop. Samples of the material collected by the New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) were found to contain mercury at concentrations up to 653 mg/kg.

Mercury contamination at the site is suspected to be the result of the use of mercury-contaminated industrial waste to fill a wetland on which the trailer park is now located.

Description of threat

Contaminants located at the surface may pose a threat to the health of the trailer park residents. The analytical results of soil and waste samples collected by the EPA Region II Technical Assistance Team (TAT) October 13 through 20, 1994, were forwarded to NYSDOH and the Agency for Toxic Substance and Disease Registry (ATSDR) for evaluation. A Health Consultation is forthcoming.

C. Preliminary Assessment Results/Site Inspection Results

On October 13, 1994, EPA and TAT mobilized to the site to verify mercury contamination and delineate the horizontal extent of contamination in surface soils.

Between October 13 and 15, 1994, 54 surface soil samples were analyzed using a Spectrace Model 9000 X-Ray Fluorescence Analyzer (XRF). Mercury contamination was determined to be widespread in surface soils in the trailer park. The area of surface contamination was determined to encompass 15,000 square feet.

One composite waste sample was collected on October 20, 1994, for waste characterization and mercury speciation. For waste characterization the sample was analyzed for Target Compound List (TCL) parameters, Target Analyte List (TAL) parameters, and toxicity by the Toxicity Characteristic Leachate Procedure (TCLP):

The results of TAL analysis indicate that calcium and mercury are present in elevated concentrations. Mercury was detected at an estimated concentration of 130 mg/kg and

calcium at a concentration of 170,000 mg/kg. All other metals are below or within the background concentration range for metals in uncontaminated soil.

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The following organic compounds were detected in the sample: methylene chloride, pyrene, phenanthrene, fluoranthene, benzo(k)fluoranthene, benzo(b)fluoranthene, benzo(a)anthracene, chrysene and benzo(a)pyrene. The concentration of these compounds in the waste are below the NYSDEC recommended soil cleanup objectives.

All TCLP results are below regulatory limits. Therefore, the waste does not exhibit the characteristic of toxicity, as defined by the Resource Conservation and Recovery Act.

The results of the speciation of mercury indicate that the sample contained no significant quantities of elemental mercury, monomethyl mercury, or dimethyl mercury. The sample dissolved completely in a 4N HCl leach test. The mercury +2 ion concentration in the leachate was essentially the same as the total mercury concentration in the sample. Based on these results, the laboratory concluded that the sample is a chemical substrate contaminated with a mercuric or mercurous salt.

On November 17, 1994, the EPA Environmental Response Team (ERT) and the Response Engineering and Analytical Contractor (REAC) collected dust samples in each of the trailers at the site. The analytical results of these samples have not yet been evaluated for compliance with quality assurance/quality control guidelines.

On December 6, 1994, ERT, REAC, and TAT advanced 11 soil borings to a depth of eight feet in the waste disposal area. Soil samples were collected and screened for mercury using an XRF to determine the vertical extent of contamination. Soil samples collected at the lower limit of contamination, as determined using the XRF, were delivered to a laboratory for confirmatory analysis. The results of this analysis are forthcoming. Based on XRF data, it is estimated that 3,600 cubic yards of waste and contaminated soil are present on site.

Upon approval of the Actson Memorandum activities associated

IV. Response Information

A. Situation

1. Current situation

On October 12, 1994, a public meeting was held in the Village of Harriman to discuss the site and address the concerns of the community. This meeting was attended by representatives of the Village of Harriman, Orange County Department of Health, NYSDOH, NYSDEC, ATSDR and EPA.

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On November 28, 1994, a public availability session was held in the Village of Harriman. This session was attended by representatives of NYSDOH, ATSDR, and EPA. The results of sampling conducted October 13 through 20, 1994, were made available to the public at this meeting.

2. Removal actions to date

The EPA On-Scene Coordinator is currently writing an Action Memorandum for authorization to begin removal activities.

3. Enforcement

The waste found on site was reportedly generated by the Pyridium Corporation during the 1940s. Nepera Inc. currently occupies and operates the facility previously operated by the Pyridium Corporation.

On November 28, 1994, Nepera Inc. signed an Administrative Order on Consent with EPA agreeing to relocate residents of the trailer park.

B. Planned Removal Actions

The scope of work for the proposed removal action includes decontamination and removal of the mobile homes from the trailer park; removal and disposal of waste and associated contaminated soil; and restoration of the site.

C. Next Steps

Upon approval of the Action Memorandum activities associated with decontamination and removal of the trailers will be initiated.

D. Key Issues

None.

V. Cost Information

The Action Memorandum has not been completed, the project ceiling has not been set, and no costs have been incurred that are applicable to the project ceiling.

VI. Disposition of Wastes

N/A

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